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19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**  
26 **DISTRICT OF NEVADA**

27 HSBC BANK, USA, NATIONAL  
28 ASSOCIATION, AS TRUSTEE, IN TRUST  
29 FOR THE REGISTERED HOLDERS OF  
30 ACE SECURITIES CORP. HOME EQUITY  
31 LOAN TRUST, SERIES 2006-NC2, ASSET  
32 BACKED PASS-THROUGH  
33 CERTIFICATES,

34 Plaintiff,

35 vs.

36 FIDELITY NATIONAL TITLE GROUP,  
37 INC., et al.,

38 Defendants.

Case No.: 2:21-cv-01300-APG-NJK

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO MOTION FOR REMAND [ECF  
No. 10] AND MOTION FOR FEES  
AND COSTS [ECF No. 11]**

**(First Request)**

Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff HSBC Bank USA, National Association, as Trustee, in Trust for the Registered Holders of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC2, Asset Backed Pass-Through Certificates (“HSBC Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On July 8, 2021, HSBC Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-837574-C [ECF No. 1-1];
2. On July 8, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On August 9, 2021, HSBC Bank filed a Motion for Remand [ECF No. 10];
4. On August 9, 2021, HSBC Bank filed a Motion for Costs and Fees [ECF No. 11];
5. Chicago Title’s deadline to respond to HSBC Bank’s Motion for Remand and Motion for Costs and Fees is August 23, 2021;
6. Chicago Title’s counsel is requesting an extension until September 23, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
7. Chicago Title requests an extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Chicago Title additional time to respond to the legal arguments set forth in HSBC Bank’s motions;
8. HSBC Bank does not oppose the requested extension;
9. This is the first request for an extension which is made in good faith and not for purposes of delay;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to HSBC Bank's  
2 Motion for Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11] is hereby  
3 extended through and including September 23, 2021.  
4

5 Dated: August 19, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
8 SCOTT E. GIZER  
9 SOPHIA S. LAU  
Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

10 Dated: August 19, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair  
12 KEVIN S. SINCLAIR  
13 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

14 Dated: August 19, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Christina V. Miller  
16 DARREN T. BRENNER  
17 CHRISTINA V. MILLER  
Attorneys for Plaintiff HSBC BANK, U.S.A,  
National Association

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19 **IT IS SO ORDERED:**

20  
21 Dated: August 19, 2021

22 By:   
23 UNITED STATES DISTRICT COURT JUDGE  
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